

Remarks

Claims 1-12 currently stand rejected. Claim 2 is canceled. Thus, claims 1 and 3-12 remain in the application. Claims 1, 3-9 and 11 have been amended. The Assignee respectfully traverses the rejections and requests allowance of claims 1 and 3-12.

Claim Amendments

Claim 1 is amended to incorporate the limitations of claim 2, thus further providing a communication link between at least a second party of the number of parties of the telephone call and the message translator. Further, the nature of each of the communication links of claim 1 are described in greater detail. More specifically, the communication link between the first party and the message translator is a full-duplex text communication link, while the communication link between the second party and the message translator is a voice communication link. Support for a full-duplex connection is provided in the application at, for example, the second full paragraph of page 8. In addition, the provision of "a communication link between a conference bridge and the message translator" is added, as discussed in the first two paragraphs of page 12 of the current application.

Claim 2 is canceled, as the provisions of that claim have been incorporated into claim 1.

Claim 3 is amended to indicate that the connections between the server, the relay center and the first party are also full-duplex in order to provide the full-duplex text communication link between the first party and the message translator. Claims 6 and 7 are amended similarly.

Claims 4, 5 and 8 are amended to properly refer to the voice and full-duplex text communication links of claim 1.

Claim 9 is amended to indicate that the connections for the back end and front end interfaces of the server are full-duplex text connections. Also, a conference bridge, as described above, is also added.

Claim 11 is amended to indicate that the connection from the server to an available message translator is a full-duplex text connection.

Provisional Obviousness-Type Double Patenting Rejection

Claims 1-12 stand provisionally rejected under the judicially-created doctrine of

obviousness-type double patenting as being unpatentable over claims 1-26 of copending U.S. Patent Application No. 09/723,790. The Assignee respectfully elects to postpone any discussion of the propriety of the provisional obviousness-type double patenting rejection, or the possibility of filing a terminal disclaimer under 37 C.F.R. § 1.321(c), while claims 1-12 of the current application stand rejected on other grounds.

Rejection for Lack of Enablement Under 35 U.S.C. § 112, First Paragraph

Claim 1 stands rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. More specifically, the Office action indicates that the specification is non-enabling for failing to disclose all possible steps for performing the stated single-step method of claim 1. Page 3 of the Office action.

The Assignee respectfully traverses the rejection in light of the current amendments to claim 1. More specifically, amended claim 1 now comprises three steps: (1) "providing a full-duplex text communication link between at least a first party of a number of parties of the telephone call and the message translator...;" (2) "providing a voice communication link between at least a second party of the number of parties of the telephone call and the message translator;" and (3) "providing a communication link between a conference bridge and the message translator...." As a result, the Assignee asserts that claim 1, as amended, is no longer a single step claim. Therefore, the Assignee respectfully requests that the 35 U.S.C. § 112, first paragraph, enablement rejection of claim 1 be withdrawn.

Anticipation Claim Rejections Under 35 U.S.C. § 102

Claims 1-11 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,421,425 to Bossi et al. (hereinafter "Bossi"). In addition, claims 1-11 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,546,082 to Alcendor et al. (hereinafter "Alcendor"). The Assignee respectfully traverses these rejections in light of the current amendments to claims 1 and 9 and the following discussion.

Amended method claim 1 currently provides, in part, "providing a *full-duplex text communication link* between at least a first party of a number of parties of the telephone call and

the message translator *via an Internet Protocol connection*" (Emphasis supplied.) Similarly, amended system claim 9 now provides back end and front end interfaces of a server for establishing full-duplex text connections between the relay center and the terminal device by way of Internet Protocol. In other words, at least one caller is coupled with a message translator or relay center by way of a full-duplex text connection via an Internet Protocol connection, in which text communications can occur simultaneously in both directions.

Claim 1 also provides for "a communication link between a conference bridge and the message translator" to allow conference calls made possible by way of the full-duplex text communication link, as discussed in the present application in the first two paragraphs of page 12. Claim 9 provides a similar limitation.

Bossi discloses a communication system in which a Text Teletypewriter (TTY) device 101 is coupled with a communications carrier network 103 having a Telecommunications Relay Service (TRS) platform 104, which includes a protocol conversion server 113. Fig. 1; and column 3, lines 33-39. Thus, Bossi is distinguished from claims 1 and 9 by its use of a TTY device 101, which is a "specialized terminal with a keyboard on which text characters are typed for conversion to tones using well-known Baudot-format." Column 1, lines 22-25. In other words, while the TTY device 101 facilitates a text connection with the protocol conversion server 113, that connection employs analog tone signals over a phone line, which are not carried by one of an Internet Protocol connection and a digital network connection, as provided for in claims 1 and 9. Also, a characteristic of the TTY device 101 is that only half-duplex communications are provided, as indicated in the first full paragraph of page 3 of the current application. As a result, a full-duplex text communication link or connection, as provided for in claims 1 and 9, cannot involve a TTY device.

Bossi also discloses an "Internet network 120 to which is coupled a workstation 102" by way of an ISP server 121. Column 4, lines 25-37. While a party employing the workstation 102 may converse by way of text with a user of the TTY device 101, only half-duplex communications may occur due to the limitations of the TTY device 101. Also, Bossi provides no indication or suggestion that the workstation 102 is coupled with the Internet network 120 via a full-duplex communication link.

Further, Bossi neither teaches nor suggests the possibility of using a conference bridge in conjunction with a full-duplex text connection, as only single-party-to-single-party connections

are discussed.

Thus, given the foregoing, the Assignee asserts that claims 1 and 9 are allowable in view of Bossi, and such indication is respectfully requested.

Alcendor discloses a Public Switched Telephone Network (PSTN) with an Advanced Intelligent Network (AIN) system and a Central Office (CO) that allows individuals who are hearing- or speech-impaired to participate in telephony conversations. Column 3, lines 19-56. More specifically, a non-impaired PSTN subscriber using a handset telephone 102 is connected through a PSTN network 108 to an impaired user employing a data processing system 104 executing an application such as a Web browser for accessing data on a Web server 106 over the PSTN network. Fig. 1; and column 5, lines 5-34. Further, a Text-to-Speech (TTS) server 106 and a Speech Recognition (SRECO) server 118 are used to transfer text and voice messages between the telephone 102 of the unimpaired party and the data processing system 104 of the impaired party. Fig. 1; and column 5, lines 35-53. However, no indication is provided that the communication path between the impaired party of the data processing system 104 and the Web server 106 is "full-duplex," as provided for in claims 1 and 9. In fact, Alcendor instead states that the impaired party of the data processing system 104 controls when the unimpaired party may respond to messages, as the unimpaired party may send a message to the impaired party only when prompted by the impaired party, regardless if the impaired party is speech-impaired only (column 6, line 57, to column 7, line 20; and Fig. 4, steps 402-412), hearing-impaired only (column 7, line 57, to column 8, line 27; and Fig. 5, steps 502-512) or both speech- and hearing impaired (column 7, lines 21 to 56; and Fig. 6, steps 602-616). Thus, the system as shown in Fig. 1, and the process as illustrated in Figs. 4, 5 and 6, of Alcendor enforce a half-duplex protocol between the impaired and unimpaired parties of the phone call.

Further, Alcendor makes does not discuss or suggest a conference bridge or conference calling in conjunction with a full-duplex connection, as only connections involving two parties are disclosed.

Thus, the Assignee contends that claims 1 and 9 are allowable in view of Alcendor, and such indication is respectfully requested.

Claims 3-8 depend from independent claim 1, and claims 10-12 depend from independent claim 9, and thus incorporate the provisions of their respective independent claims. Therefore, the Assignee contends that claims 3-8 and 10-12 are allowable for at least the reasons provided

above for claims 1 and 9, and such indication is respectfully requested.

As noted above, claim 2 has been canceled. Thus, the anticipation rejections as applied to claim 2 are rendered moot.

Therefore, in light of the foregoing, the Assignee respectfully requests withdrawal of the 35 U.S.C. § 102(e) rejections of claims 1-11.

Obviousness Claim Rejections Under 35 U.S.C. § 103

Claim 12 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bossi in view of U.S. Patent No. 6,717,936 to Srinivasan (hereinafter "Srinivasan"). Claim 12 also stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Alcendor in view of Srinivasan. The Assignee respectfully traverses these rejections in light of the current amendments to claim 9, and in view of the foregoing discussion.

More specifically, claim 12 depends from independent claim 9, and thus incorporates the provisions of that particular independent claim. Therefore, the Assignee asserts that claim 12 is allowable for at least the reasons provided above regarding independent claim 9. Further, Srinivasan neither teaches nor suggests a "full-duplex text connection" or a "conference bridge" as provided for in claim 9. The Assignee thus respectfully requests that the 35 U.S.C. § 103(a) rejections of claim 12 be withdrawn.


Conclusion

Based on the above remarks, the Assignee submits that claims 1 and 3-12 are allowable. Additional reasons in support of patentability exist, but such reasons are omitted in the interests of clarity and brevity. The Assignee thus respectfully requests allowance of claims 1 and 3-12.

The Assignee believes no additional fees are due with respect to this filing. However, should the Office determine additional fees are necessary, the Office is hereby authorized to charge Deposit Account No. 21-0765.

Respectfully submitted,

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